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April 26, 2022

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Centre Street  
New York, NY 10007

Re: U.S. v. Graciela Borrero  
19 Cr. 789 PGG)

Dear Judge Gardephe:

**MEMO ENDORSED:**

The sentencing scheduled for May 11, 2022, is adjourned to **May 25, 2022, at 11:00 a.m.** The Defendant's submission is now due **May 11, 2022.** The Government submission is due **May 18, 2022.**

SO ORDERED.



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Paul G. Gardephe  
United States District Judge  
Dated: April 29, 2022

I write on behalf of Graciela Borrero, and with the consent of the Government, to respectfully request an additional two weeks postponement from today's date for the submission of the defense sentencing memoranda. It is further requested that the Government submission and the sentencing hearing dates be adjusted accordingly.

For the past month, I have been extensively engaged in a case that taken up an inordinate amount of my time in preparation for a trial and possible resolution (U.S. v. Hammatt (19 Cr. 067)). That case has recently been resolved. Additionally the defense requests the additional time in order to obtain letters of support and other documents in preparation for the defense submission. Therefore it is respectfully requested that the court grant this application.

As noted above, the Government has no objection to this request, therefore I would respectfully request that the Court set a sentencing schedule convenient for the court.

Respectfully submitted,

/s/ Donald duBoulay, Esq.

Cc: Stephanie Simon, Assistant U.S. Attorney (via ECF)  
Louis Pellegrino, Assistant U.S. Attorney (via ECF)  
Mathew Andrews, assistant U.S. Attorney (via ECF)